

February 6, 2013  
Via US ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

RE: GrayBear Resources Corp.  
Form 499 Filer ID: 829113  
Annual Customer Proprietary Network Information Compliance Certification;  
EB Docket No. 06-36

Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36, filed on behalf of GrayBear Resources Corp.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Please do not hesitate to contact me at 407-260-1011 or [mark@csilongwood.com](mailto:mark@csilongwood.com) if you have any questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,



Mark G. Lammert, CPA  
Tax Preparer for GrayBear Resources Corp.

cc: GrayBear Resources Corp.  
file: GrayBear Resources Corp.- PUC - FCC

**STATEMENT OF POLICY IN TREATMENT OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. It is GrayBear Resources Corp. (hereafter referred to as "GrayBear Resources") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
2. GrayBear follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or GrayBear. However, GrayBear cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
  - A. If an unauthorized disclosure were to occur, GrayBear shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
  - B. GrayBear shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
  - C. Notwithstanding the provisions in subparagraph B above, GrayBear shall not wait the additional seven (7) days to notify its customers if GrayBear determines there is an immediate risk of irreparable harm to the customers.
  - D. GrayBear shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.
  - A. Specifically, GrayBear shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
    1. When the customer has pre-established a password.
    2. When the information requested by the customer is to be sent to the customer's address of record, or
    3. When GrayBear calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.

- Records of approvals are maintained for at least one year.
  - GrayBear provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
  - The content of GrayBear's CPNI notices comply with FCC rule 64.2008 (c).
8. GrayBear has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
  9. GrayBear has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, GrayBears' sales personnel will obtain express approval of any proposed outbound marketing request for customer approval of the use of CPNI by The General Counsel of GrayBear.
  10. GrayBear notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
  11. GrayBear may negotiate alternative authentication procedures for services that GrayBear provides to business customers that have a dedicated account representative and a contract that specifically addresses GrayBears' protection of CPNI.
  12. GrayBear is prepared to provide written notice within five business days to the FCC of any instance where the opt-in mechanisms do not work properly to such a degree that consumer's inability to opt-in is more than an anomaly.

**ANNUAL 47 C.F.R. S: 64.2010 (e) CPNI CERTIFICATION FOR 2013**  
**EB Docket 06-36**

Date Filed: January 28, 2013  
Name of Company: GrayBear Resources Corp.  
Form 499 Filer ID: 829113  
Name of Signatory: Benny Carreon  
Title of Signatory: President

I, Benny Carreon, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. &64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et. seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: \_\_\_\_\_

